

Robocall Mitigation Plan

Overview

The FCC requires that all small voice service providers (“VSPs”) certify in the Robocall Mitigation Database that they have implemented a Robocall Mitigation Plan (“RMP”) to ensure that they are not originating illegal robocalls.

The FCC requires that VSPs develop a RMP that:

- Details the reasonable steps taken to avoid originating illegal robocalls;
- Demonstrates a commitment to respond to traceback requests to cooperate with investigators and stopping illegal robocalls; and
- Is filed in the Robocall Mitigation Database.

The FCC states that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

The VoIP Talk, LLC is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates The VoIP Talk’s RMP.

Know Your Customer (“KYC”)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with The VoIP Talk, LLC in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

At the time of sign-up, customers are required to fill in their physical business location, contact person, and information on their business. The VoIP Talk, LLC asks for their business website and other social media links, if any. The business website goes through a spam check automatically i.e., gets a spam score, or a company representative manually checks the website (if there is no spam score) of the customer before the account is confirmed. Sometimes the company representative goes through social media links such as LinkedIn and Instagram. Depending on the spam score or observations of the company representative, the account is confirmed.

Acceptable Use Policy (“AUP”)

The VoIP Talk, LLC maintains an AUP that subscribers must sign before being permitted to use The VoIP Talk, LLC. Among other things, the AUP prohibits: (a) providing false identity or falsifying the origin of a message or phone call, (b) violating any applicable law or industry-accepted guidelines, (c) using The VoIP Talk, LLC for fraudulent activities or bypassing phone identification systems and (d) engaging in spam or unsolicited marketing or harassing messages.

Monitoring

The VoIP Talk, LLC has in-house fraudulent and illegal robocall detection services that notify or suspend the offending party's account in the event suspicious activity (typically indicated by certain calling patterns) is detected. Along with the in-house measures, The VoIP Talk’s upstream provider also suspends any account used to engage in such suspicious activity unless a legitimate use case is submitted by the offending party.

Investigate Suspicious Activity

Upon detecting suspicious activity, The VoIP Talk's team investigates the recent and past call detail records along with payment/credit card risk score. The VoIP Talk's team notifies the offending party for a legitimate use case of calling. Until The VoIP Talk receives the legitimate use case (if any), the account is suspended. If the use case is considered to be not legitimate i.e., if the offending party has not responded or has not been able to show its legitimacy, the account is closed.

The VoIP Talk follows Industry Traceback Group ("ITG") recommended best industry practices and cooperates and will continue to cooperate in traceback and trace forward investigations. To allow for timely and comprehensive responses, The VoIP Talk will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

The VoIP Talk implement Do Not Originate requests it received periodically from the ITG. The VoIP Talk works with its upstream carrier to block suspicious calls. If The VoIP Talk and its upstream carrier identify suspected robocalling patterns that are confirmed with further investigation, The VoIP Talk will take appropriate action which may include suspending or terminating the subscriber's use of The VoIP Talk.

The VoIP Talk will cooperate with Investigative Bodies to the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. The VoIP Talk will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue. In the event of any material change to this plan, The VoIP Talk will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.